

**OFFICE OF THE FEDERAL PUBLIC DEFENDER
DISTRICT OF MARYLAND**

NORTHERN DIVISION
TOWER II, 9th FLOOR
100 SOUTH CHARLES STREET
BALTIMORE, MARYLAND 21201-2705
TEL: (410) 962-3962
FAX: (410) 962-0872

JAMES WYDA
FEDERAL PUBLIC DEFENDER

ELIZABETH G. OYER
ASSISTANT FEDERAL PUBLIC DEFENDER

April 15, 2019

Honorable Charles B. Day
United States Magistrate Judge
U.S. District Court for the District of Maryland
6500 Cherrywood Lane
Greenbelt, Maryland 20770

Re: *United States v. Christopher Hasson*, Criminal Case No. 19-cr-0096-GJH

Dear Judge Day:

I am writing on behalf of my client, Christopher Hasson, to respectfully request that Your Honor schedule a further detention hearing in this matter. On February 21, 2019, an initial detention hearing was held, at which the Court ordered Mr. Hasson detained. However, the Court invited the defense to seek reconsideration of the order of detention in the event that the government did not bring charges against Mr. Hasson pertaining to his alleged domestic terrorism activities – which were the heart of the government’s case for detention – within 14 days. Specifically, the Court stated:

So my ruling comes with a caveat. The ruling is that I find that the Government has met its burden by clear and convincing evidence that Mr. Hasson is a danger. The caveat is that I am giving the Government 14 days in the absence of charging Mr. Hasson with any of the assorted criminal activity that they allude to and have argued here today about. I invite the Defense to come back, and at that time I very well may limit my consideration of these extra activities to whatever it is that the accused is facing by way of a trial in this court.

Transcript of 2/21/19 Hearing, at 27.

Many more than 14 days have now passed, and the government has not charged Mr. Hasson with any terrorism-related offense. An indictment was returned on February 27, 2019, charging Mr. Hasson with the same two offenses that were initially charged by complaint (a firearms-possession offense and a misdemeanor drug-possession offense), plus two additional firearms-possession offenses. No other crimes have been charged. Moreover, during a recent status call, government counsel advised the Court and defense counsel that it does not expect to file a superseding indictment in this matter.

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In light of these circumstances, the defense would like to accept the Court's invitation to return for a further hearing on the issue of pretrial detention. We respectfully request that the Court schedule a hearing at the earliest agreeable date for all parties.

Respectfully,

/s/

Liz Oyer
Assistant Federal Public Defender

EGO:sdf
cc: Thomas P. Windom, Esq.